

COLE SCHOTZ P.C.

Michael D. Sirota, Esq. (NJ Bar No. 014321986)
Warren A. Usatine, Esq. (NJ Bar No. 025881995)
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
(201) 489-3000
msirota@coleschotz.com
wusatine@coleschotz.com

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Christine A. Okike, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
(212) 446-4800
jsussberg@kirkland.com
christine.okike@kirkland.com

*Proposed Attorneys for Debtors and
Debtors in Possession*

HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992)
Kenric D. Kattner, Esq. (admitted *pro hac vice*)
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-7300
richard.kanowitz@haynesboone.com
kenric.kattner@haynesboone.com

*Proposed Attorneys for Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JANUARY 17, 2023 AT 10:00 A.M. (EASTERN TIME)**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

UNCONTESTED MATTERS GOING FORWARD:

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Taxes and Fees and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers Pursuant to Bankruptcy Code §§ 105(a), 363(b), 507(a)(8), and 541(d) [Docket No. 9].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order Granting Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Pay Certain Taxes and Fees and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers Pursuant to Bankruptcy Code §§ 105(a), 363(b), 507(a)(8), and 541(d) [Docket No. 55]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Notice of Revised Proposed Order on Debtors' Tax Motion [Docket No. 267]

Status: This matter is going forward as a final hearing on a consensual basis.

2. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utility Companies from Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment [Docket No. 10].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utility Companies From Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment[Docket No. 51]

- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Notice of Revised Proposed Order on Debtors' Utilities Motion [Docket No. 293]

Status: This matter is going forward as a final hearing on a consensual basis.

- 3. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 363(c) Authorizing the Debtors to (I) Continue, Renew, or Supplement Insurance Policies, (II) Pay Insurance Premiums and Related Obligations Thereon, (III) Continue, Renew, or Supplement the Surety Bond Program, and (IV) Granting Related Relief [Docket No. 11].

Responses Received:

- A. Informal comments incorporated.
- B. The Official Committee of Unsecured Creditors' Response and Reservation of Rights Regarding Debtors' Insurance Motion [Docket No. 235]

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order Granting Debtors' Expedited Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 363(c) Authorizing the Debtors to (I) Continue, Renew, or Supplement Insurance Policies, (II) Pay Insurance Premiums and Related Obligations Thereon, (III) Continue, Renew, or Supplement the Surety Bond Program, and (IV) Granting Related Relief [Docket No. 49]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Notice of Revised Proposed Order on Debtors' Insurance Motion [Docket No. 268]

Status: This matter is going forward as a final hearing on a consensual basis.

- 4. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Claimants and (II) Granting Related Relief [Docket No. 13].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order Granting Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Claimants and (II) Granting Related Relief [Docket No. 52]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Notice of Revised Proposed Order on Debtors' Claimants Motion [Docket No. 292]

Status: This matter is going forward as a final hearing on a consensual basis.

- 5. Debtors' Motion for Entry of an Order Authorizing and Approving Procedures for Rejection of Executory Contracts and Unexpired Leases [Docket No. 122].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Second Day Motions [Docket No. 126]
- B. Notice of Adjournment of Hearing [Docket No. 186]
- C. Notice of Revised Proposed Order on Debtors' Rejection Procedures Motion [Docket No. 290]

Status: This matter is going forward as a final hearing on a consensual basis.

- 6. Debtors' Motion for Entry of an Administrative Fee Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court [Docket No. 123].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Second Day Motions [Docket No. 126]
- B. Notice of Adjournment of Hearing [Docket No. 186]
- C. Notice of Revised Proposed Order on Debtors' Administrative Procedures Motion [Docket No. 269]

Status: This matter is going forward as a final hearing on a consensual basis.

7. Debtors' Motion for Entry of an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. 124].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Second Day Motions [Docket No. 126]
- B. Notice of Adjournment of Hearing [Docket No. 186]
- C. Notice of Revised Proposed Order on Debtors' Ordinary Course Professionals Motion [Docket No. 289]

Status: This matter is going forward as a final hearing on a consensual basis.

8. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Continue Servicing and Administration Activities in the Ordinary Course of Business with Respect to the Debtors' Institutional Loan Portfolio and Granting Related Relief and (II) Authorizing and Establishing Procedures Regarding the Restructuring, Settlement, or Other Modifications of Institutional Loans and Loan Obligations [Docket No. 125].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Second Day Motions [Docket No. 126]
- B. Notice of Adjournment of Hearing [Docket No. 186]
- C. Notice of Revised Proposed Order on Debtors' Institutional Loan Procedures Motion [Docket No. 291]

Status: This matter is going forward as a final hearing on a consensual basis.

9. Debtors' Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [Docket No. 14].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [Docket No. 50]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Proof of Publication [Docket No. 76]
- E. Notice of Adjournment of Hearing [Docket No. 186]
- F. Notice of Revised Proposed Final Order on NOL Motion [Docket No. 284]

Status: This matter is going forward as a final hearing on a consensual basis.

- 10. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 16].

Responses Received: Informal comments incorporated.

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 43]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Notice of Revised Proposed Final Order on Wages Motion [Docket No. 285]

Status: This matter is going forward as a final hearing on a consensual basis.

- 11. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Use of Existing Business Forms and Records, (B) Maintain Existing Corporate Bank Accounts and Cash Management System, (C) Pay Prepetition Bank Fees Associated with the Cash Management System, and (D) Continue Performance of Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition

Intercompany Balances, and (III) Waiving Certain U.S. Trustee Requirements [Docket No. 7].

Responses Received:

- A. Informal comments incorporated.
- B. United States Trustee's Limited Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Use of Existing Business Forms and Records, (B) Maintain Existing Corporate Bank Accounts and Cash Management System, (C) Pay Prepetition Bank Fees Associated with the Cash Management System, and (D) Continue Performance of Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Waiving Certain U.S. Trustee Requirements [Docket No. 270]

Related Documents:

- A. Declaration of Mark A. Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order (I) Authorizing the Debtors to (a) Continue Use of Existing Business Forms and Records, (b) Maintain Existing Corporate Bank Accounts and Cash Management System, (c) Pay Prepetition Bank Fees Associated with the Cash Management System, and (d) Continue Performance of Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Waiving Certain U.S. Trustee Requirements [Docket No. 44]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Notice of Revised Proposed Final Order on Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Use of Existing Business Forms and Records, (B) Maintain Existing Corporate Bank Accounts and Cash Management System, (C) Pay Prepetition Bank Fees Associated with the Cash Management System, and (D) Continue Performance of Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Balances, and (III) Waiving Certain U.S. Trustee Requirements [Docket No. 283]

Status: This matter is going forward as a final hearing on a consensual basis.

- 12. Motion to Intervene in Adversary Proceeding by the Official Committee of Unsecured Creditors [Adversary Docket No. 47]

Status: This matter is going forward as a final hearing on a consensual basis.

MATTERS ADJOURNED TO MARCH OMNIBUS HEARING:

13. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders, and (V) Granting Related Relief [Docket No. 4].

Responses Received:

- A. United States Trustee's Objection to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders, and (V) Granting Related Relief [Docket No. 232]
- B. Joinder of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders, and (V) Granting Related Relief [Docket No. 234]
- C. Official Committee of Unsecured Creditors' Reply in Opposition to the United States Trustee's Objection to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders, and (V) Granting Related Relief [Docket No. 278]
- D. Statement of The Ad Hoc Committee of Wallet Account Holders in Support of The Debtors' Redaction Motion [Docket No. 282]

Related Documents:

- A. Declaration of Mark Renzi in Support of Debtors' Chapter 11 Petitions and First-Day Motions [Docket No. 17]
- B. Interim Order Granting Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders, and (V) Granting Related Relief [Docket No. 53]
- C. Notice of Second Day Hearing [Docket No. 58]
- D. Notice of Adjournment of Hearing [Docket No. 186]
- E. Debtors' Response to U.S. Trustee's Objection to Debtors' Consolidation and Redaction Motion [Docket No. 275]
- F. Supplemental Declaration of Mark Renzi in Support of Debtors' Consolidation and Redaction Motion [Docket No. 276]
- G. Declaration of Brian Tichenor of Moelis & Company, LLC in Support of Debtors' Consolidation and Redaction Motion and Declaration in Support of Debtors' Sealing Motion [Docket No. 277]

Status: Adjourned to March 13, 2023, at 10:00 a.m. (ET).

14. Debtors' Motion for Entry of an Order Authorizing the Debtors to File Under Seal the Names of Certain Confidential Transaction Parties in Interest Related to the Debtors' Professional Retention Applications [Docket No. 127].

Responses Received:

- A. United States Trustee's Objection to the Debtors' Motion for Entry of an Order Authorizing the Debtors to File Under Seal the Names of Certain Confidential Transaction Parties in Interest Related to the Debtors' Professional Retention Applications [Docket No. 233]

Related Documents:

- A. Notice of Adjournment of Hearing [Docket No. 186]
- B. Supplemental Declaration of Brian Tichenor of Moelis & Company, LLC in Support of Debtors' Consolidation and Redaction Motion and Declaration in Support of Debtors' Sealing Motion [Docket No. 277]

Status: Adjourned to March 13, 2023, at 10:00 a.m. (ET).

Dated: January 16, 2023

/s/ Michael D. Sirota

COLE SCHOTZ P.C.

Michael D. Sirota, Esq. (NJ Bar No. 014321986)
Warren A. Usatine, Esq. (NJ Bar No. 025881995)
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
(201) 489-3000
msirota@coleschotz.com
wusatine@coleschotz.com

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Christine A. Okike, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
(212) 446-4800
jsussberg@kirkland.com
christine.okike@kirkland.com

HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992)
Kenric D. Kattner, Esq. (admitted *pro hac vice*)
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-7300
richard.kanowitz@haynesboone.com
kenric.kattner@haynesboone.com

*Proposed Attorneys for Debtors and
Debtors in Possession*